



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 07 2016

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Article Number: 7015 3010 0001 6837 3755

Mr. Donnie Stein, Plant Manager
Georgia-Pacific Gypsum
1101 South Front Street
Camden, New Jersey 08103

RE: Request for Information ("RFI") Pursuant to Section 308 of the Clean Water Act
Compliance Evaluation Inspection Report ("CEI") conducted on April 5, 2016 at
Georgia-Pacific Gypsum
Docket No. CWA-IR-17-002

Dear Mr. Stein:

The United States Environmental Protection Agency ("EPA") is charged with the protection of human health and the environment under the Clean Water Act ("CWA" or "Act"), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

Georgia-Pacific Gypsum is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA documentation with accompanying photographs of the following no later than deadlines specified:

1. No later than thirty (30) calendar days of receipt of this RFI, submit documentation with accompanying photographs of the measures taken to address the Areas of Concern specified in the enclosed Inspection Report.

All information required to be submitted by this Request for Information shall be sent by certified mail or its equivalent to the following address:

Douglas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
290 Broadway, 20th Floor
New York, NY 10007-1866

Any documents to be submitted by Georgia-Pacific Gypsum must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

“I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations.”

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Enclosed is a copy of the inspection report detailing EPA's findings from the April 5, 2016 inspection at the Harris Camden Terminal Facility.

If you have any questions regarding this Request for Information or the enclosed Inspection Report, please feel free to contact Cyndy Kopitsky of my staff via phone at (212) 637-3832 or via email at kopitsky.cyndy@epa.gov.

Sincerely,



Douglas McKenna, Chief
Water Compliance Branch

Enclosure

cc: Marcedius Jameson, Administrator, Water and Land Use Enforcement, NJDEP
(w/enclosures)

United States Environmental Protection Agency
Washington, D.C. 20460
Water Compliance Inspection Report

Form Approved.
OMB No. 2040-0057

Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES										yr/mo/day		Inspection Type		Inspector		Fac Type											
1	N	2	5	3	N	J	0	1	2	9	9	1	7	11	12	0	4	0	5	1	6	17	18	C	19	R	20	2	
Remarks																													
21																													
Inspection Work Days										Facility Self-Monitoring Evaluation Rating										B1		QA		Reserved					
67	1	69	70	5	71	N	72	N	73	74	75	80																	

Section B: Facility Data

Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number)												Entry Times/Dates				Permit Effective Date			
Georgia-Pacific Gypsum LLC 1101 South Front Street Camden, New Jersey 08103												1:30 PM				8/01/2016			
												Exit Times/Dates				Permit Expiration Date			
												4:15 PM				7/31/2021			
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)												Other Facility Data							
Ellen Speace, Environmental Engineer, Phone 856-963-6936 Fax 856-966-1475 Donnie Stein, Plant Manager-III, Phone 856-963-6931 Fax 856-964-2868												SIC Code: 3275 Lat/Long: 39.931511/-75.130196							
Name, Address of Responsible Official/Title/Phone and Fax Number(s)																			
Ellen Speace, Environmental Engineer Phone 856-963-6936 Fax 856-966-1475												Contacted X Yes No							

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/>	Permit	<input type="checkbox"/>	Flow Measurement	<input checked="" type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Pollution Prevention
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Compliance Schedules	<input type="checkbox"/>	Pretreatment	<input type="checkbox"/>	Multimedia
<input type="checkbox"/>	Effluent/Receiving Water	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water	<input type="checkbox"/>	Other:

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

See attached report.

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Phone and Fax Numbers		Date	
		EPA/DECA-WCB/(212) 637-3832 FAX:x3953		10.19.16	
Signature of Management Q/A Reviewer		Agency/Office/Phone and Fax Numbers		Date	
		EPA/DECA-WCB/(212) 637-4268/FAX:x3953		10/13/16	

EPA Form 3560-3 (Rev 9-94) Previous editions are obsolete

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, New York, NY 10007

COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: Georgia-Pacific Gypsum	
Inspection Date: April 5, 2016	Inspection Time: 1:30PM – 4:15PM
EPA Inspector: Cyndy S. Kopitsky, Environmental Scientist, USEPA Region 2, DECA, Water Compliance Branch (212) 637-3832 & Andrew Dinsmore, Stormwater Team Leader USEPA Region 3 (215) 814-2788	
NJDEP Representative: Sandy Cowley (609) 439-9537	
On-Site Representative: Ellen Speace, Environmental Engineer, 856-963-6936 Donnie Stein, Plant Manager-III, 856-963-6931	
Site Information:	Georgia-Pacific Gypsum 1101 South Front Street Camden, New Jersey 08103

INTRODUCTION:

On April 5, 2016, the United States Environmental Protection Agency (“EPA”) conducted a Compliance Evaluation Inspection (“CEI”) at Georgia-Pacific Gypsum located at 1101 South Front Street, Camden, New Jersey (the “Site” or “Facility”) to determine compliance with the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (5G2).

As identified in the permit, the Georgia-Pacific Gypsum facility manufactures gypsum plaster products from gypsum rock which is brought to the site by ship and truck. The gypsum rock is stored in a bulk storage pile on the west side of the site. The processes at this location include crushing the gypsum rock and forming it into dry stucco through cooking. Processing, handling, and storing the finished products are performed within an enclosed manufacturing building. The Georgia-Pacific Gypsum facility’s stormwater system includes catch basins, manholes, underground pipes, a Vortechs unit, and two outfalls to the Delaware River. The Vortechs unit, located at the north outfall, is designed to remove sediments and debris from surface runoff with the use of a grit chamber and a flow control wall.

This facility transports materials by rail located on site and onto trucks. Materials come in by ship from Nova Scotia or Spain. Fireproofing is the Georgia-Pacific Gypsum primary market.

There are 2 outfalls at this facility. One outfall is located on the south end of the facility and the second outfall is located on the north side of the facility. The north side outfall has a 21 inch cast iron pipe which is located on the neighboring property belonging to the South Jersey Port Corporation.

INSPECTION PROCEDURE:

Upon arrival at the Site, EPA inspectors presented credentials to Ms. Speace, the environmental engineer and Mr. Stein, the plant manager of Georgia-Pacific Gypsum. EPA conducted an opening conference with Ms. Speace and Mr. Stein, conducted a field inspection, and took photographs of any areas of concern at the Site and surrounding areas. Ms. Speace informed the EPA inspectors that a majority of the files were available as electronic files only. At that time, Ms. Speace set up on the file presentation in their meeting room. In order to facilitate the walkthrough inspection procedures, EPA inspectors informed Ms. Speace that any detailed information such as quarterly inspection reports available only from the databases, could be provided at a later date.

FINDINGS & OBSERVATIONS:

At the time of the inspection, Ms. Speace and Mr. Stein were onsite and informed EPA inspectors that:

- This facility employs 37 people and operations occur 24 hours daily and 5 days weekly.
- This facility has annual safety training for general staff and conducts a 3-4 day training for new hires. The training includes mostly stormwater and spill response issues.
- There are 38 storm drains at this facility and storm discharge is monitored on a quarterly basis.
- There is no truck cleaning or truck maintenance at this facility.

During the walkthrough EPA observed 2 diesel fuel tanks, 38000 and 2500 gallons as seen in photos DSCN7073, DSCN7074.

During the walkthrough EPA observed filter fabric in some of the catch basins as seen in photos DSCN7058, DSCN7060.

During the walkthrough, EPA observed the 2 outfalls that discharge to the Delaware River. One was located at the southern end of the facility near the gypsum piles (DSN001A) and the other outfall located at the northern end on the property belonging to South Jersey Port Corporation (DSN002A) as seen in photos DSCN7064 and DSCN7069.

AREAS OF CONCERN:

Identified in the part C.1.ii of the 2009 Permit, good housekeeping procedures shall be implemented to help maintain a clean and orderly work place. For certain activities or areas, contact of source materials with stormwater may be prevented and/or minimized merely by using good housekeeping methods. One procedure that the facility can incorporate is to implement careful materials storage practices. As identified in part C.4.a. of the 2016 Permit, an additional the Best Management Practices (BMP's) includes the Gypsum Rock Bulk Storage Pile and that it should be bermed in such a manner as to eliminate stormwater run-through. At the time of the inspection, EPA observed a raw gypsum pile potentially exposed to stormwater as seen in photo DSCN7066 and DSCN7070.

CLOSING:

A closing conference was held with Ms. Speace explaining the findings of the inspection. Any additional questions were answered at that time.

ATTACHMENTS:

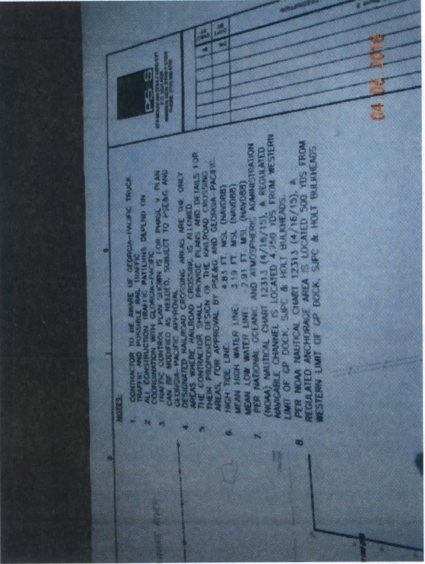
Photographs

Attachment 1 - Photograph Log: Georgia-Pacific Gypsum, 1101 South Front Street, Camden New Jersey.
Unedited photographs taken on April 5, 2016 by Cyndy S. Kopitsky, Physical Scientist, DECA-WCB, USEPA Region 2 with EPA Olympus Stylus camera.

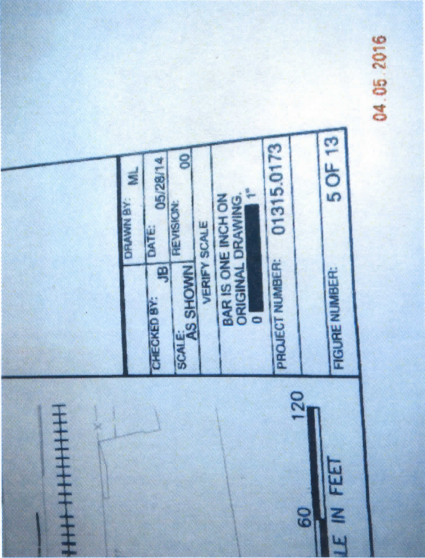
DSCN7055	Map of Facility
DSCN7056	Map of Facility
DSCN7057	Map of Facility
DSCN7058	Drain w/Insert
DSCN7059	Diesel Fuel Tank
DSCN7060	Drain w/Insert
DSCN7061	Gypsum Pile
DSCN7062	Sampling location
DSCN7063	Load/unload station
DSCN7064	Outfall
DSCN7065	Old outfall
DSCN7066	Gypsum Pile
DSCN7067	South Jersey Port Delivery Area
DSCN7068	Sampling location
DSCN7069	Outfall
DSCN7070	Operations
DSCN7071	Error
DSCN7072	Warehouse
DSCN7073	Fuel Tank
DSCN7074	Fuel Tank



DSCN7055



DSCN7056



DSCN7057



DSCN7058



DSCN7059



DSCN7060



DSCN7061



DSCN7062

4/05/2016

Georgia-Pacific Gypsum Camden CEI



DSCN7063



DSCN7064



DSCN7065



DSCN7066

4/05/2016

Georgia-Pacific Gypsum Camden CEI



DSCN7067



DSCN7068



DSCN7069



DSCN7070



DSCN7072



DSCN7073



DSCN7074

4/05/2016

Georgia-Pacific Gypsum Camden CEI